

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

_____)	
UNITED STATES OF AMERICA)	
)	
V.)	CR. NO. 13-cr-00142-PB
)	
JOHNATHON IRISH)	
)	
_____)	

DEFENDANT’S ASSENTED TO MOTION TO CONTINUE

The defendant requests that this Court issue an order continuing the trial in this case from the two week period beginning February 4, 2014 for at least 90 days. Grounds follow:

The defendant has been charged with two counts of making a false statement to a federal agent in violation of 18 U.S.C. § 1001; one count of aiding and abetting the making of a false statement in connection with the acquisition of a firearm in violation of 18 U.S.C. §§ 2 and 922; one count of engaging in the business of dealing in firearms without a license in violation of 18 U.S.C. § 922(a)(1)(A); and one count of possession of a firearm by a regular user of a controlled substance in violation of 18 U.S.C. § 922(g)(3). The first scheduled trial date is February 4, 2014.

On Friday, January 10, 2014 initial discovery was made available at the US Attorneys Office. On, Monday, January 13, 2014, the defendant received and began reviewing the initial discovery. The discovery includes approximately 2740 pages of documents. It also includes 61 additional discs which apparently contain hundreds of

video and audio recordings. It will take a substantial amount of time simply to review all of this material. In addition, the case presents potential issues of substantial constitutional importance related to the Second Amendment to the United States Constitution.

The requested continuance is necessary so that the defendant can have the opportunity to review and analyze the discovery and to research the potential Second Amendment issues.

AUSA Nicholas Abramson has no objection to this motion.

The defendant agrees to waive his right to speedy trial with respect to any delay caused by the granting of this motion. A fully executed waiver will be forthcoming under a separate heading.

No memorandum of law is necessary to the resolution of the issues raised herein.

WHEREFORE the defendant requests that this Court issue an Order continuing the trial in this case from the two week period beginning February 4, 2014 for at least 90 days.

Respectfully submitted,
Johnathon Irish
By His Attorney,

Date: January 17, 2014

/s/ Jonathan R. Saxe
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CERTIFICATE OF SERVICE

I hereby certify that the above document was served on the following persons on January 17, 2014, and in the manner specified herein: electronically served through ECF to AUSA Nicholas Abramson and US Attorney John Kacavas.

/s/ Jonathan R. Saxe
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